

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA** )

**Plaintiff,** )

**v.** )

**JERRY DALE CASH,** )

**Defendant.** )

**Case No.** CR-09-241-L

**Violation:** **18 U.S.C. § 1350(c)(2)**

**INFORMATION**

The United States Attorney charges:

At all times relevant:

**Introduction**

1. Quest Resources Corporation and its affiliated company Quest Energy Partners, L.P. (collectively “Quest”) were in the oil and gas business. Quest was headquartered in Oklahoma City, Oklahoma, and its stock was publicly traded on the NASDAQ Global Market System.

2. From no later than 2004 through 2008, **JERRY DALE CASH** worked as Quest’s CEO and, as such, was required by federal law to certify the accuracy of Quest’s quarterly and annual financial reports filed with the U.S. Securities & Exchange Commission.

**COUNT 1**  
**(False Sarbanes-Oxley Certification)**

3. The United States incorporates by reference paragraphs 1 through 2.

4. On or about August 11, 2008, in the Western District of Oklahoma,

----- **JERRY DALE CASH** -----

knowingly and willfully certified that Quest's quarterly financial report filed with the Securities & Exchange Commission fully complied with the requirements of section 13(a) of the Securities Exchange Act of 1934 and that the information contained in that quarterly financial report fairly presented, in all material respects, the financial condition and results of Quest's operations. **CASH** did so knowing that certification was false.

5. Specifically, prior to August 11, 2008, **CASH** had worked with a fellow officer to transfer \$10 million out of Quest to an account controlled by **CASH** in the name of Rockport Energy. They did so without the knowledge or approval of the Board of Directors.

6. **CASH** then spent the \$10 million in Quest funds primarily on non-Quest investments and renovations to his Nichols Hills home. No member of the Board of Directors or anyone else in senior management at Quest, other than the fellow officer who helped him transfer the money, knew **CASH** was spending the money on non-Quest investments or other personal items.


7. Nevertheless, on August 11, 2008, **CASH** knowingly and willfully certified that the financial report filed on August 11, 2008, was accurate. **CASH** did so with the specific intent to violate the law and knowing that the financial report did not disclose any

of the facts discussed in paragraphs 5 and 6 and, therefore, did not comply with federal disclosure requirements.

**All in violation of 18 U.S.C. § 1350(c)(2).**



JOHN C. RICHTER  
United States Attorney



JEB BOATMAN  
SANFORD C. COATS  
Assistant U.S. Attorneys